IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

SOUTHERN DISTRICT OF MISSISSIPPI
FILED
MAR 20 2017
ARTHUR JOHNSTON
BY ______ DEPUTY

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 1:17cr25 HSO-RHW

DORIS KELLEY

26 U.S.C. § 7206(2)
26 U.S.C. § 7212(a)

The United States Attorney charges:

COUNT 1

On or about June 9, 2014, in Harrison County in the Southern Division of the Southern District of Mississippi and elsewhere, the defendant, **DORIS KELLEY**, did willfully aid and assist in, procure, counsel, and advise the preparation and presentation to the Internal Revenue Service, of a false U.S. Individual Income Tax Return, Form 1040, of an individual known herein as "L.R." for the calendar year 2013. The return was false and fraudulent as to a material matter, in that the information on line 61 was false, as the defendant then and there well knew, in violation of Section 7206(2), Title 26, United States Code.

COUNT 2

From in or about January 1, 2009 through January 1, 2016, the exact dates unknown to the United States Attorney, in Harrison County in the Southern Division of the Southern District of Mississippi and elsewhere, the defendant, **DORIS KELLEY** did corruptly endeavor to obstruct and impede the due administration of the internal revenue laws of the United States by various means, including, but not limited to:

a. Converting funds intended as tax payments to the Internal Revenue Service for her own personal use;

b. Filing false income tax returns for herself and for others in order to conceal the aforementioned conversion of funds for her own personal use.

All in violation of Section 7212(a), Title 26, United States Code.

HAROLD BRITTAIN
Acting United States Attorney